

FILED  
UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
12/21/04 PM 4:49

CONVERSE INC.,

Plaintiff,

vs.

ALON INTERNATIONAL S.A.,

Defendant.

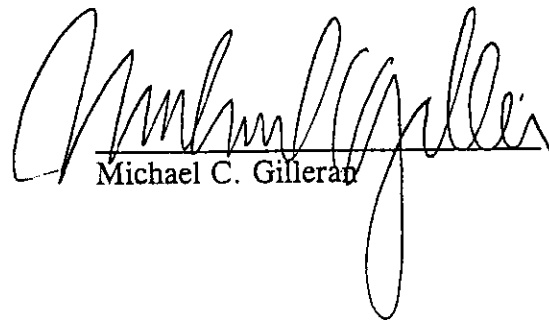
DOCKET NO.: 04-12591-PBS

AFFIDAVIT OF MICHAEL GILLERAN

Michael Gilleran, on oath, deposes and states:

1. My name is Michael C. Gilleran. I am counsel to Plaintiff Converse Inc. ("Converse"). I am aware of the facts set forth in the accompanying affidavit of Chris Laganas that ALON will file suit immediately or within days in Brazil and/or Argentina. As yet, I am not aware that ALON has done so. I note especially the statements of counsel for ALON in Brazil in their letter of Dec. 14, 2004 (Laganas Aff. Ex. "H"), that ALON set a deadline which Converse believes (after it was extended by one day) expired on Friday, Dec. 17, 2004 at 6:00 pm, and the comments of officers of ALON that ALON would file suit in Brazil and/or Argentina to tie up Converse (Laganas Aff., ¶ 15). I therefore am informed and believe that, if notified in advance of the hearing on Converse's application for a temporary restraining order, ALON will speed up its timetable for filing suits in Brazil and/or Argentina and file such suits before this Court can issue a temporary restraining order.

Signed under the penalties of perjury.



Michael C. Gilleran

Dated: December 21, 2004